



Handley Farah & Anderson PLLC

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October 1, 2020

**VIA ECF**

Honorable Valerie E. Caproni  
United States District Judge  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 240  
New York, NY 10007

**Re: Belle, et al., v. City of New York, et al., 19 CV 2673 (VEC)**

Dear Judge Caproni:

The parties respectfully submit this joint update in accordance with the Court's June 21, 2019 Order (ECF No. 18).

Over the past month, the parties have taken the following actions to further the litigation:

- On September 1, 2020, the parties submitted a proposed amended litigation schedule, which the Court so-ordered (ECF No. 64).
- By March 19, 2020, Defendant City confirmed that record searches had been documented for Plaintiffs Richmond Appiah, Bonacio Crespi, and Edison Quito. On September 25, 2020, the City identified the NYPD officers involved in the alleged stop and records search of plaintiff Richmond Appiah. On September 30, 2020, the City produced records relating to Edison Quito, which in the City's opinion demonstrates that the previously identified record search conducted for Quito was made in connection with a separate incident resulting in a summons issued to Quito. The City has represented that it has no other indication that a records search was conducted for Quito on any other relevant dates. Plaintiffs still await identification of the NYPD officers involved in the stop and record search of Plaintiff Crespi and

requested document production related to his stop. The parties will meet and confer about the scope of additional disclosures and the timeline for outstanding document productions.

- The parties have scheduled the deposition of NYPD Sergeant Joseph Klubnick for October 29, and have been meeting and conferring about deposition schedules for the named plaintiffs and NYPD officers involved in the alleged stops and records searches.

Thank you for your consideration of this matter.

Respectfully submitted,

CYRUS JOUBIN  
43 West 43<sup>rd</sup> Street, Suite 119  
New York, NY 10036

GEORGE FARAH  
MATTHEW HANDLEY  
REBECCA P. CHANG  
HANDLEY FARAH & ANDERSON PLLC  
777 6<sup>th</sup> Street NW, 11<sup>th</sup> Fl.  
Washington, DC 20001

JAMES L. BERNARD  
KEVIN CURNIN  
DAVID J. KAHNE  
TALONA H. HOLBERT  
MICHAEL MALLON  
STROOCK & STROOCK & LAVAN LLP  
180 Maiden Lane  
New York, NY 10038

MOLLY GRIFFARD  
STEVEN WASSERMAN  
COREY STOUGHTON  
ANTHONY POSADA  
THE LEGAL AID SOCIETY  
199 Water Street, 6<sup>th</sup> Floor  
New York, New York 10038

*Attorneys for Plaintiff*

JAMES JOHNSON  
Corporation Counsel of the  
City of New York  
100 Church Street  
New York, NY 10007  
*Attorney for Defendant City of New York*



By: \_\_\_\_\_

Cyrus Joubin  
George F. Farah  
Matthew K. Handley  
Rebecca P. Chang  
James L. Bernard  
Kevin Curnin  
David J. Kahne  
TaLona H. Holbert  
Michael Mallon  
Molly Griffard  
Steven Wasserman  
Corey Stoughton  
Anthony Posada  
*Attorneys for Plaintiffs*

By: */s/ W. KeAupuni Akina*  
Stephanie Michelle Vilella Alonso  
W. KeAupuni Akina  
*Attorneys for City of New York*